

### **REMARKS**

In the Office Action, claims 1-10 were pending. Upon entry of the present amendment, these claims remain pending, and new claims 11-14 are added. Applicants submit that the present amendment does not introduce new matter to the application.

Claims 1 and 2 stand rejected under 35 U.S.C. §102(e) as being anticipated by Dwek (U.S. Patent No. 6,248,946). Claim 3 stands rejected under 35 U.S.C. §103(a) as being unpatentable over a combination of Dwek and Andrews et al. (U.S. Patent No. 6,105,062). Claims 4 and 5 stand rejected under 35 U.S.C. §103(a) as being unpatentable over a combination of Dwek and Van Der Meulen et al. (U.S. Patent No. 6,563,769). Claim 6 stands rejected under 35 U.S.C. §103(a) as being unpatentable over a three-way combination of Dwek, Van Der Meulen et al. and Fanning et al. (U.S. Patent No. 6,742,023). Claim 7 stands rejected under 35 U.S.C. §103(a) as being unpatentable over a combination of Dwek and Stefik (U.S. Patent No. 5,530,235). Claims 8-10 stand rejected under 35 U.S.C. §103(a) as being unpatentable over a combination of Dwek and Marcus (U.S. Patent No. 6,032,156). Applicants respectfully traverse these grounds of rejection, especially insofar as the rejections are applied to the claims as amended.

### **Independent Claim 1 and Dependent Claims 2-11**

Amended independent claim 1 recites, among other features, the following:

and wherein the management system has, for a selected plurality of media objects as represented by the categories, association links linking categories located at different levels in the hierarchical tree so that a user can traverse the tree by viewing a first media object in a first category at a first level in the tree, and then directly viewing a second object in a second category at a second level in the tree, where the first and second categories do not have a parent and child relationship in the tree.

None of the cited art, alone or in combination, teaches or suggests such a management system and its association links.

The Action relies primarily on Dwek for rejecting claim 1, and for the tree recited in that claim. Dwek relates generally to an online jukebox allowing users to listen to songs via the Internet. Dwek shows the songs being arranged by genre, artist, CD and song title. See, e.g., Fig. 3A. The Action relies on this genre-artist-CD-song relationship to show the claimed hierarchical taxonomy tree and the claimed association links. Action, p. 3, citing Dwek Fig. 3 and col. 7, lines 25-50. This alleged tree, however, fails to teach or suggest the specific features recited in the amended claim 1 taxonomy tree. For example, even assuming that the Dwek genre-artist-CD-song information were considered to be located at different levels in Dwek's alleged tree, there is no teaching or suggestion of "association links linking categories located at different levels in the hierarchical tree so that a user can traverse the tree by viewing a first media object in a first category at a first level in the tree, and then directly viewing a second object in a second category at a second level in the tree, where the first and second categories do not have a parent and child relationship in the tree," as recited in amended claim 1. Instead, the "link" between, for example, a song's CD and its artist in Dwek relies on its parent and child relationship.

For at least these reasons, Applicants submit that amended claim 1 distinguishes over Dwek. The remaining references of record do not overcome this deficiency. Indeed, the Action does not rely on any of the other references for a hierarchical tree at all. Applicants submit that claim 1 distinguishes over the art of record, and is in condition for allowance. Claims 2-11 depend from claim 1, and are allowable for at least the same reasons as claim 1, and further in view of the various advantageous and novel features recited therein. For

example, claim 2 recites “The multi-media management system according to claim 1, wherein selected nodes of the tree are association nodes with each association node providing a one-way link to another node of the tree so as to provide an association link between nodes.” The Action relies on Dwek for this feature as well, but does not explain how the Dwek “links” are allegedly “one-way,” as recited in the claim. No such “one way links” are taught or disclosed in Dwek.

Additionally, Applicants note that a number of the alleged combinations and modifications of the cited references lack proper motivation. For example, the Action combines Dwek and Stefik to reject claim 7. As discussed above, Dwek relates to an Internet-based application for listening to songs. Stefik, on the other hand, relates to a portable “DocuCard” that can be used to carry electronic data around for a user. The Action cites no teaching or suggestion from these references that would suggest, for example, that the entire Internet-based music application from Dwek could fit on the Stefik “DocuCard.”

#### **Independent Claim 12 and Dependent Claims 13-14**

New independent claim 12 recites, among other features, the following:

where a first plurality of parent nodes is at a higher level in the tree than a second plurality of child nodes, and wherein two nodes at different levels in the tree have different assigned type values, and wherein the taxonomy tree further includes one or more association links allowing direct access between first and second associated nodes that do not bear a parent and child relationship in the tree

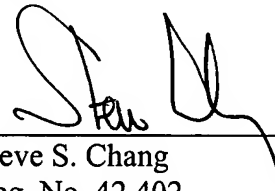
None of the art of record teaches or suggests a method step using such a taxonomy tree. For example, the alleged “tree” in Dwek does not have “association links allowing direct access between first and second associated nodes that do not bear a parent and child relationship in

the tree,” as recited in claim 12. None of the other cited references (none of which were cited to show the previously-recited hierarchical tree in claim 1) overcomes this deficiency, and for at least these reasons, Applicants submit that the new independent claim 12 is in condition for allowance. Claims 13 and 14 depend from claim 12, and are allowable for at least the same reasons as claim 12, and further in view of the various advantageous and novel features recited therein.

### **Conclusion**

For at least the reasons set forth above, Applicants submit that pending claims 1-14 distinguish over the art of record, and are in condition for allowance. However, should the Examiner feel that additional discussion and/or amendment is needed to place the application in condition for allowance, the Examiner is invited to telephone the Applicants' undersigned representative at the number appearing below.

Respectfully submitted,



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